

PAYNE & FEARS LLP

ATTORNEYS AT LAW  
4 PARK PLAZA, SUITE 1100  
IRVINE, CALIFORNIA 92614  
(949) 851-1100

- 1 RISE LAW FIRM, PC
- 2 Jana M. Moser (SBN 281072)
- 3 Meghan K. Maher (SBN 317908)
- 4 5900 Wilshire Blvd., Suite 2600
- 5 Los Angeles, California 90036
- 6 Telephone : 310.728.6588
- 7 Facsimile: 310.728.6560
- 8 jana@riselawfirm.com
- 9 meghan@riselawfirm.com
- 10 Attorneys for Plaintiff
- 11 CHRISTINA NELSON
- 12 Eric C. Sohlgren, Bar No. 161710
- 13 ecs@paynefears.com
- 14 Alejandro G. Ruiz, Bar No. 271999
- 15 agr@paynefears.com
- 16 PAYNE & FEARS
- 17 4 Park Plaza, Suite 1100
- 18 Irvine, CA 92614
- 19 Telephone: (949) 851-1100
- 20 Facsimile: (949) 851-1212
- 21 James M. Cleary, Jr., Texas Bar No. 00783838
- 22 *Admitted Pro Hac Vice*
- 23 cleary@mdjwlaw.com
- 24 MARTIN, DISIERE, JEFFERSON & WISDOM, LLP
- 25 808 Travis, 20th Floor
- 26 Houston, TX 77002
- 27 Telephone: (713) 632-1775
- 28 Fax No.: (713) 222-0101
- Attorneys for Defendant
- GENUENT USA, LLC.
- Ronald D. Arena, Bar No. 218421
- Satia Famili, Bar No. 319215
- ARENA HOFFMAN LLP
- 44 Montgomery Street, Suite 3520
- San Francisco, CA 94104-4828
- Telephone: 415.433.1414
- Facsimile: 415.520.0446
- Email: rarena@arenahoffman.com
- Attorneys For Defendant
- MUFG Union Bank, N.A.

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

3 CHRISTINA NELSON, an  
4 individual,

5 Plaintiff,

6 v.

7 GENUENT USA, LLC, a New  
8 Hampshire corporation; MUFG  
9 UNION BANK, N.A., a California  
10 national association; and DOES 1  
11 through 10, inclusive,

12 Defendants.

Case No. 3:18-cv-05930

ASSIGNED TO HON. JON S. TIGAR

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO  
TRANSFER VENUE**

12 IT IS HEREBY STIPULATED by and CHRISTINA NELSON ("Plaintiff"),  
13 Defendant GENUENT USA, LLC ("Genuent"), and Defendant MUFG UNION  
14 BANK, N.A. ("Union Bank") (collectively, "the Parties"), by and through their  
15 attorneys of record:

16 WHEREAS, the Complaint ("Complaint") in this matter was filed on August  
17 27, 2018 in Superior Court of the State of California, County of San Francisco;

18 WHEREAS, on September 27, 2018, Defendants Genuent and Union Bank  
19 removed the action to the Northern District of California;

20 WHEREAS, the Parties have met and conferred concerning the venue of this  
21 action;

22 WHEREAS, Plaintiff reported remotely to Genuent's Orange County office;

23 WHEREAS, the worksite from which assignments were made was Genuent's  
24 Orange County office;

25 WHEREAS, the Genuent employee who terminated Plaintiff works out of  
26 Genuent's Orange County office;

27 WHEREAS, the documents pertinent to this lawsuit within California are kept  
28 at Genuent's Orange County office and/or Union Bank's Monterey Park office;


1 WHEREAS, the witnesses Defendants intend to utilize in this lawsuit are  
2 located in Genuent's Orange County office and/or Union Bank's Monterey Park  
3 office;

4 WHEREAS, the Parties agree that, pursuant to 28 U.S.C. § 1404(a), this action  
5 should be transferred to the United States District Court for the Central District of  
6 California, Southern Division for the convenience of the parties and witnesses, as all  
7 or most of Plaintiff's causes of action are based on conduct which allegedly occurred  
8 in that District and Defendant's witnesses with knowledge of such alleged conduct  
9 are located in that District;

10 THEREFORE IT IS HEREBY STIPULATED AND AGREED:

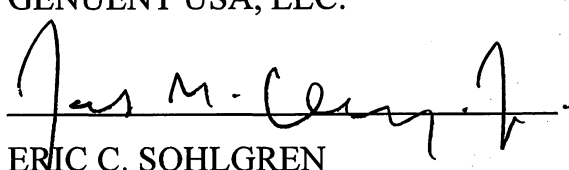
11 1. This action shall be transferred from the Northern District of California to the  
12 United States District Court for the Central District of California, Southern Division.

13 Dated: October 23, 2018

14   
15 JANA M. MOSER  
16 MEGHAN K. MAHER  
17 RISE LAW FIRM, PC

18 Attorneys for Plaintiff  
19 CHRISTINA NELSON  
20 GENUENT USA, LLC.

21 Dated: October 23, 2018

22   
23 ERIC C. SOHLGREN  
24 PAYNE & FEARS

25 JAMES M. CLEARY, JR.  
26 MARTIN, DISIERE, JEFFERSON &  
27 WISDOM, LLP

28 Attorneys for Defendant  
GENUENT USA, LLC.

1 Dated: October 23, 2018

*Ronald D. Arena by permission*

RONALD D. ARENA,  
SATIA FAMILI  
ARENA HOFFMAN LLP

Attorneys For Defendant  
MUFG UNION BANK, N.A.

**[PROPOSED] ORDER**

Upon consideration of the parties' Joint Stipulation to Transfer Venue, and  
good cause appearing therefore, IT IS HEREBY ORDERED that this action be  
transferred to the United States District Court for the Central District of California,  
Southern Division.

**IT IS SO ORDERED.**

Dated: October 29, 2018

*Jon S. Tigar*

Judge JON S. TIGAR  
United States District Court,  
Northern District of California